BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

RECEIVED

DEC 26 5 01 PH 'OI

POSTAL PITTERSON FOR SUN OFFICE OF THE SEC - ART

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

MOTION FOR LATE ACCEPTANCE OF RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORY OF AMERICAN BUSINESS MEDIA AND THE MCGRAW-HILL COMPANIES (ABM-MH/USPS-T34-13)

The United States Postal Service hereby moves for acceptance, three business days late, of its response to the following interrogatory of American Business Media and the McGraw-Hill Companies: ABM-MH/USPS-T34-13, filed on December 5, 2001. The response was delayed because of the need to coordinate a response among several Postal Service witnesses and attorneys who were busy with other discovery and hearings.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 (202) 268-2986; Fax –6187 December 26, 2001

David H. Rubin

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

David H. Rubin

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 December 26, 2001